



*United States Attorney  
Eastern District of New York*

NS:MKP/TH

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December 7, 2018

By Hand and ECF

The Honorable Vera M. Scanlon  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere et al.  
Criminal Docket No. 18-204 (S-1) (NGG) (VMS)

Dear Judge Scanlon:

The government respectfully writes to amend its December 4, 2018 motion for a protective order to defer disclosure of three partially sealed warrants and accompanying affidavits (the “Warrants”) until one month prior to the date set for suppression motions. See Dkt. No. 216, dated December 4, 2018 (the “Prior Motion”). At the time of filing the Prior Motion, the Court had not set a date by which any suppression motions should be filed, but yesterday that date was set for January 7, 2018—which would make today the date for disclosure per the Prior Motion.

For the reasons set forth in the Prior Motion and in the government’s accompanying ex parte filing, both of which are incorporated herein by reference, the government now respectfully requests that (1) disclosure of the unredacted Warrants be deferred until December 21, 2018 to enable the government to mitigate certain concerns set forth in its ex parte filing prior to any disclosure, and (2) on December 21, 2018, the Warrants be disclosed to the relevant defendants pursuant to a limited unsealing order

unsealing the unredacted Warrants only for the purpose of the defendants' raising any legal challenges. A proposed order is enclosed for the Court's consideration.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
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Enclosure

cc: Counsel of record (by ECF)  
Clerk of Court (NGG) (by ECF)